

201-15484

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR

**American
Chemistry
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July 23, 2004

The Honorable Michael O. Leavitt
Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Attn: HPV Chemical Challenge Program

Dear Administrator Leavitt:

The Brominated Phthalates Panel (Panel) of the American Chemistry Council submits its test plan for Phthalic Acid Tetrabromo Ester (CAS # 26040-51-7) under the High Production Volume (HPV) Challenge Program. The Panel has not yet received an HPV registration number, therefore, I am attaching the letter informing EPA about the establishment of the consortium.

In preparing this test plan, the Panel has given careful consideration to the principles contained in the letter EPA sent to all HPV Challenge Program participants on October 14, 1999. As requested by EPA in that letter, the Panel has sought to maximize the use of scientifically appropriate categories of related chemicals and of structure activity relationships. Additionally, and also as requested in EPA's letter, in analyzing the adequacy of existing data, the Panel has conducted a thoughtful, qualitative analysis rather than use a rote checklist approach. The Panel has taken the same thoughtful approach when developing this revised test plan and believes it conforms to those principles.

If you have any questions, please contact Marian Stanley, Manager of the Brominated Phthalate Panel at 703-741-5623 or marian_stanley@americanchemistry.com.

Sincerely yours,

Courtney M. Price

cc: C. Auer, EPA
B. Leczynski, EPA
R. Hefter, EPA
S. Russell, ACC



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June 10, 2004

The Honorable Michael O. Leavitt
Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Attn: HPV Chemical Challenge Program

Dear Administrator Leavitt:

This letter is to inform you that the American Chemistry Council's Brominated Phthalates Panel (Panel) will serve as an industry consortium to coordinate activities for Phthalic Acid Tetrabromo Ester (CAS # 26040-51-7) under the HPV Chemical Challenge Program ("Program").

The following three companies are currently members of the Panel: Teknor Apex Company, Great Lakes Chemical Corporation and Unitex Chemical Company. Each of these companies previously sent a separate letter to EPA regarding its commitment to sponsor this chemical under the HPV Program.

The letters address the companies' commitment to the Program. If, for any reason, this voluntary initiative is not completed by the Panel, then any express or implied commitments to the Program will devolve to the manufacturers and importers of the chemical.

The Panel and its member companies understand that sponsorship entails: (1) assembling and reviewing available test data; (2) developing and providing a test plan for the sponsored chemical; and, where needed, (3) conducting additional testing. The test data and any other study information that the Panel's HPV Testing Group will provide under the Program will be made publicly available in the form of "robust summaries" as contemplated in the *Framework for Voluntary Testing of High Production Volume (HPV) Chemicals* (10/8/98). The Panel plans to submit the test plan and robust summaries by July 1, 2004.

Marian K. Stanley, Manager of the Brominated Phthalate Esters Panel, will serve as the technical contact for the group. She can be reached by phone at 703-741-5623 or by fax at 703-741-6091.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

cc: Brominated Phthalates Panel
Richard Denison, Environmental Defense
Diane Sheridan, EPA OPPT/OCD

